

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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| LAURA HOFFMAN, et al., Plaintiffs, v. MICHAEL O'MALLEY, et al., Defendants. | Case No.: 1:18-CV-00309 Judge Christopher A. Boyko Plaintiffs' Notice of Video Depositions of (1) Defendant Michael O'Malley, and (2) Representatives of Defendant Cuyahoga County pursuant to Fed.R.Civ.P. 30(B)(6) |
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Please take notice that, pursuant to Rule 30(B)(6) of the Federal Rules of Civil Procedure, Plaintiffs Laura Hoffman and Linda Herman will take the deposition upon oral examination, **on May 23 and 24, 2019**, of Defendant Cuyahoga County by and through one or more officers, directors, managing agents, or other persons who are designated to testify on its behalf with respect to following topics:

1. The reasons for the County's respective decisions to advise Plaintiff Laura Hoffman, Plaintiff Linda Herman, and Robin Belcher, in February 2017, that each of these persons could resign from her employment with the Cuyahoga County Prosecutor's Office ("CCPO") or face termination of that employment, and the facts supporting those reasons. *See* Responses and Objections to Plaintiffs' Amended Second Set of Interrogatories to Defendant Cuyahoga County, Nos. 1, 2, and 5.
2. The reasons for the County's respective decisions to discipline Chad Cleveland, Kristen Hatcher, Lakesha Johnson, and Ralph Kolasinski for allegedly mishandling sexual-assault cases in the juvenile justice unit in 2017, as identified in the County's Responses and Objections to Plaintiffs' Third Set of Interrogatories, No. 8, and the facts supporting those reasons.
3. The reasons for the County's respective decisions to allow Chad Cleveland, Kristen Hatcher, Lakesha Johnson, and Ralph Kolasinski to remain employed by the CCPO, as stated in the County's Responses and Objections to Plaintiffs' Third Set of Interrogatories, No. 8.
4. The County's communications with members of the news media about the alleged mishandling of sexual-assault cases in the juvenile justice unit in 2017, which led to the allegedly defamatory news coverage as identified in the Complaint in this lawsuit, and the reasons why the County communicated with the media about this subject.

5. The County's negotiations with Laura Hoffman over reasonable accommodations for her disability.

Additionally, **on June 12, 2019**, Plaintiffs will, pursuant to Fed.R.Civ.P. 30, take the deposition upon oral examination of Defendant Michael O'Malley.

The depositions shall begin on the above-noticed dates at 9:00 AM at The Pattakos Law Firm LLC, 101 Ghent Road, Fairlawn, OH 44333, continue from day-to-day until completed, be recorded by video and stenographic means, and occur before a qualified Notary Public. This notice is being issued prior to a scheduling conference with opposing counsel for good cause, being that the witnesses to testify for the County need to be identified in accordance with the above in order for the schedule for these depositions to be finalized.

Respectfully submitted,

/s/ Peter Pattakos
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Certificate of Service

My office emailed the foregoing document to counsel for Defendants, Dave Lambert (dlambert@prosecutor.cuyahogacounty.us), Nora Poore (npoore@prosecutor.cuyahogacounty.us) and Brendan Healy (bhealy@prosecutor.cuyahogacounty.us) on March 21, 2019, and filed it on the same date using the Court's e-filing system, which will serve the document on all necessary parties.

/s/ Peter Pattakos
Attorney for Plaintiffs